

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

DEC - 6 2023

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

[REDACTED]

JALEN ALEXANDER BOBO (2)

[REDACTED]

§ SEALED

BY  
DEPUTY \_\_\_\_\_  
No. 4:23CR 268  
Judge SDJ

**INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 18 U.S.C. §§ 2422(a) & 2  
(Coercion and Enticement and Aiding  
and Abetting)

Between on or about January 21, 2021, and on or about January 27, 2021, in the  
Eastern District of Texas, and elsewhere, [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] Jalen Alexander Bobo [REDACTED] [REDACTED]

[REDACTED] defendants, did knowingly persuade,  
induce, entice, and coerce an individual, and did knowingly attempt to persuade, induce,

entice, and coerce an individual, that is, Victim 1, to travel in interstate commerce, from the State of Ohio to the Eastern District of Texas, to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense, and aided and abetted in the same.

In violation of 18 U.S.C. §§ 2422(a) and 2.

**Count Two**

Violation: 18 U.S.C. § 1594(c)  
(Conspiracy to Commit Sex Trafficking  
by Force, Fraud, and Coercion)

Between in or about 2020, and continuing until the present, in the Eastern District of Texas, and elsewhere, [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] Jalen Alexander Bobo, [REDACTED] [REDACTED] [REDACTED] [REDACTED]

defendants, in and affecting interstate and foreign commerce, did conspire with each other and with individuals known and unknown to the Grand Jury to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means an individual(s) known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause those individuals to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1).

In violation of 18 U.S.C. § 1594(c).

**NOTICE OF FORFEITURE**

Pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(1), 18 U.S.C. § 2428(a)(1), 28 U.S.C. § 2461, and 18 U.S.C. §§ 1594(d) & (e), upon conviction of the offense(s) alleged in this Indictment, the defendants, [REDACTED]

[REDACTED] ( [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] )

[REDACTED] Jalen Alexander Bobo, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] ( [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] )

[REDACTED] shall forfeit to the United States their interest in all property, real or personal, that constitutes or is derived from proceeds traceable to the aforementioned violations, including but not limited to the following property:

- a. 2008 Landrover Range Rover, bearing Texas license plate TBG3458 and VIN number SALS25488A183270;
- b. 2002 Mercedes G Wagon, bearing Texas license plate TGX1981 and VIN number WDCYR49EX2X129477;
- c. 2003 Dodge Viper, bearing Texas license plate RSF9294 and VIN number 1B3JR65Z73V500413;
- d. 2014 Mercedes Benz E Class, bearing Texas temporary buyers license plate 410L76 and VIN number WDDKJ5KB5EF248904; and
- e. All such proceeds and/or instrumentalities are subject to forfeiture by the government.

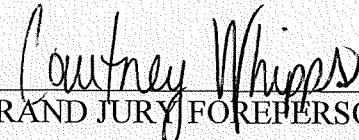
If any of the property described above as being subject to forfeiture, as a result of any act of omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;

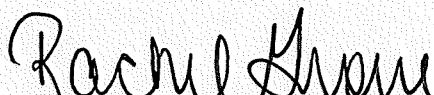
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property, which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b)(1) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above-forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

A TRUE BILL

  
Courtney Whipple  
GRAND JURY FOREPERSON

DAMIEN M. DIGGS  
UNITED STATES ATTORNEY

  
Rachel Shum  
MARISA J. MILLER  
Assistant United States Attorney

Date: 12/6/23

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**NOTICE OF PENALTY**

## Count One

Violation: 18 U.S.C. §§ 2422(a) and 2

Penalty: Imprisonment for not more than twenty years; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$100.00

## Count Two

Violation: 18 U.S.C. § 1594(c)

Penalty: Imprisonment for not more than life; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$100.00